

AIR POLLUTION CONTROL DISTRICT
REGULATORY COMPLIANCE DIVISION

POLICIES AND PROCEDURES

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Topic: Source Compliance Demonstration Period (SCDP) Tracking

Distribution: All Policy Holders

This policy and procedure document provides guidelines on the notification of the start date of a permit's Source Compliance Demonstration Period (SCDP). The SCDP allows temporary testing of equipment or a process for which an ATC has been issued before the PTO is issued. This policy is an aid to prevent unplanned expiration of SCDPs.

The SCDP is a transition period from an ATC to a PTO. Each permit has a specific period of time that the SCDP will be allowed to cover. SCDPs may be 30, 45, 90 days or longer for complex operations. The SCDP length is entered into the Permit Tracking System (PTS) by Engineering Division staff when the ATC is issued. Once construction/equipment installation is complete, the permittee is required to notify the District of the initial equipment operation date. Initial operation defines the starting date of the SCDP.

This notification must be routed to RCD's AQ Specialist Aide, who will enter the SCDP start date into the PTS (permit tracking system). [Note: If the facility is already operating the equipment when the ATC is issued, Engineering division staff enters the SCDP start date as the same date as ATC issuance.] The SCDP end date will be automatically calculated. The original notification should then be sent to file and a copy to the Enforcement Supervisor for assignment to an inspector.

DATABASE PROCEDURE

At the beginning of each month, RCD's AQ Specialist Aide will run a procedure that will list permits that are due for a SCDP inspection. The list will cover SCDP end dates from the middle of the previous month to the middle of the following month. For example, a report run on April 1 would cover March 15 to May 15.

INSPECTION SET UP

The list will be forwarded to the North and South County Enforcement Supervisors, who will assign inspectors for those facilities needing SCDP inspections. The inspector will contact the facility at least two weeks in advance to allow the facility to prepare for the inspection and to set up any needed tests to be done during the inspection.